

Exhibit

A

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

----- X
:
WILLIAM E. UNDERLAND, *on behalf of* :
himself and all others similarly situated, :
:
Plaintiff, : Electronically Filed
:
- against- :
:
DENNIS ALTER, WILLIAM A. ROSOFF, :
PHILIP M. BROWNE, DAVID B. :
WEINSTOCK, ROBERT S. BLANK, MAX :
BOTEL, THOMAS COSTELLO, DANA :
BECKER DUNN, ROBERT LUBNER, OLAF :
OLAFSSON, MICHAEL STOLPER and :
KPMG LLP, :
:
Defendants. :
:
X-----

[PROPOSED] ORDER

Upon consideration of Plaintiffs William E. Underland's and Mark Schaller's Motion for Appointment as Lead Plaintiffs and Approval of Lead Plaintiffs' Selection of Lead Counsel, and good cause appearing therefore, it is hereby ORDERED as follows:

1. Plaintiffs William E. Underland and Mark Schaller are appointed Co-Lead Plaintiffs in this action.
2. Scott + Scott, LLP and The Weiser Law Firm, P.C. are appointed Co-Lead Counsel for this action.
3. Co-Lead Counsel shall have authority to speak for plaintiffs in all matters regarding pretrial and trial procedure and settlement negotiations, and shall make all work

assignments in such manner as to facilitate the orderly and efficient prosecution of this litigation and to avoid duplicative or unproductive effort.

4. Co- Lead Counsel shall be responsible for coordination of all activities and appearances on behalf of plaintiffs and for the dissemination of notices and orders of this Court. No motion, request for discovery or other pretrial proceedings shall be initiated or filed by plaintiffs except through Co-Lead Counsel.

5. Co-Lead Counsel also shall be available and responsible for communications to and from this Court. Co-Lead Counsel shall be responsible for the creation and maintenance of a master service list of all parties and their respective counsel.

6. Defendants' counsel may rely upon all agreements made with Co-Lead Counsel, or other duly authorized representatives of plaintiffs, and such agreements shall be binding on plaintiffs.

//

//

//

//

//

//

//

//

//

//

7. Hereinafter, the caption for this case shall be as follows:

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

----- X
:
WILLIAM E. UNDERLAND and MARK :
SCHALLER, *on behalf of themselves and all* :
others similarly situated, :
Plaintiff, : Electronically Filed
:
:
- against- :
:
:
DENNIS ALTER, WILLIAM A. ROSOFF, : 10-Civ.-3621 (CMR)
PHILIP M. BROWNE, DAVID B. :
WEINSTOCK, ROBERT S. BLANK, MAX :
BOTEL, THOMAS COSTELLO, DANA :
BECKER DUNN, ROBERT LUBNER, OLAF :
OLAFSSON, MICHAEL STOLPER and :
KPMG LLP, :
Defendants. :
X-----

IT IS SO ORDERED.

Dated: _____

Hon. Cynthia M. Rufe
United States District Court